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6 Attorneys for Defendant
COINBASE GLOBAL, INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 ADAM ALFIA, individually and on behalf of
12 other persons similarly situated,

13 Plaintiffs,

14 v.

15 COINBASE GLOBAL, INC., and DOES 1
16 through 50, inclusive,

17 Defendants.

Case No. 4:21-cv-08689-HSG

STIPULATION AND ORDER

Ctrm.: 2, 4th Floor
Judge: Haywood S. Gilliam, Jr.

Date Filed: November 8, 2021

Trial Date: Not set

STIPULATION

Pursuant to Civil Local Rules 6-1 and 7-12, Plaintiff Adam Alfia and Defendant Coinbase Global, Inc. (“Coinbase Global”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on November 8, 2021, Plaintiff filed a Complaint against Coinbase Global in this matter, Dkt. 1;

WHEREAS, on November 16, 2021, Plaintiff served a copy of the summons and Complaint on Coinbase Global, such that Coinbase Global’s deadline to answer or otherwise respond to the Complaint would otherwise be December 7, 2021;

WHEREAS, the parties have met and conferred, and Coinbase Global has explained that it intends to file both (1) a motion to compel arbitration and (2) if necessary, a motion to dismiss the Complaint;

WHEREAS, to conserve the parties’ and the Court’s resources, the parties have agreed to phase briefing for the aforementioned motions; and

WHEREAS, the parties have further agreed to a briefing schedule that takes into account the upcoming holidays and counsel’s pre-existing commitments;

NOW, THEREFORE, THE PARTIES STIPULATE AS FOLLOWS:

Coinbase shall have until January 21, 2022 to file a Motion to Compel Arbitration (“MTC”) without waiving its defenses and while preserving its right to file a separate motion under Federal Rule of Civil Procedure (“Rule”) 12 (or otherwise respond to the Complaint) at a later date.

IT IS SO STIPULATED.

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1 Dated: December 2, 2021

KEKER, VAN NEST & PETERS LLP

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3 By: /s/ Erin E. Meyer
ERIN E. MEYER

4 Attorneys for Defendant
5 COINBASE GLOBAL, INC.

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7 Dated: December 2, 2021

McCATHERN LLP

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9 By: /s/ Evan Selik
EVAN SELIK
10 CHRISTINE ZAOUK

11 Attorneys for Plaintiff
12 ADAM ALFIA

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14 **ATTESTATION**

15 Pursuant to Local Rule 5-1(i)(3), I attest that each signatory above has concurred in the
16 filing of this document and has authorized the use of his or her electronic signature.

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18 Dated: December 1, 2021

/s/ Erin E. Meyer
19 Erin E. Meyer

ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that:

- Coinbase may first file a Motion to Compel Arbitration (“MTC”) without waiving its defenses and while preserving its right to file a separate motion under Federal Rule of Civil Procedure 12 (or otherwise respond to the Complaint) at a later date.
- Coinbase shall have until January 21, 2022 to file its MTC.

IT IS SO ORDERED.

DATED: 12/3/2021


HONORABLE HAYWOOD S. GILLIAM, JR.
JUDGE OF THE DISTRICT COURT